

O'Tormey, Sean P (FAA)

From: Nancy Potter Lyle <nancylyle@mtselaw.com>
Sent: Thursday, October 14, 2021 2:43 PM
To: DeLotell, Nicholas (FAA)
Cc: midwestagridrone@gmail.com; O'Tormey, Sean P (FAA)
Subject: RE: Request for Information (Second RFI) - Midwest Agri Drone, LLC (Docket FAA-2021-0702) - response required by October 19, 2021
Attachments: Midwest Agridrone Operation and Safety Manual.pdf; Midwest Agridrone Risk Assessment & Mitigation Manual.pdf; Midwest Agridrone Training Manual.pdf; Midwest Agridrone AG-122 Maintenance Manual.pdf; Midwest Agridrone CONOPS Manual.pdf

Nick,

Midwest Agridrone amends its petition to withdraw the request for multiple drone use authorization.

Also, please find attached updated manuals for Midwest Agridrone.

Thank you,

Nancy Potter Lyle
(816) 364-6677

From: Nancy Potter Lyle <nancylyle@mtselaw.com>
Sent: Monday, October 11, 2021 9:24 PM
To: DeLotell, Nicholas (FAA) <Nicholas.DeLotell@faa.gov>
Cc: midwestagridrone@gmail.com; O'Tormey, Sean P (FAA) <Sean.P.O'Tormey@faa.gov>
Subject: RE: Request for Information (Second RFI) - Midwest Agri Drone, LLC (Docket FAA-2021-0702) - response required by October 19, 2021

Nick,

Attached are the documents requested.

The maximum weight is 140 lbs.

Yes, #8 in our original request is withdrawn.

Please let us know if you need anything else.

Thank you,

Nancy Potter Lyle
(816) 364-6677

From: DeLotell, Nicholas (FAA) <Nicholas.DeLotell@faa.gov>
Sent: Tuesday, October 5, 2021 7:59 AM
To: Nancy Potter Lyle <nancylyle@mtselaw.com>
Cc: midwestagridrone@gmail.com; O'Tormey, Sean P (FAA) <Sean.P.O'Tormey@faa.gov>

Subject: Request for Information (Second RFI) - Midwest Agri Drone, LLC (Docket FAA-2021-0702) - response required by October 19, 2021

Dustin Lyle
c/o Nancy Potter Lyle, Esq.
Midwest Agri Drone, LLC
11898 County Road 363
St. Joseph, MO 64505

Dear Mrs. Lyle:

Thank you for responding to our first request, dated September 27, 2021. The following information is required to continue processing the petition for exemption, Docket No. FAA-2021-0702, which you submitted on behalf of Midwest Agri Drone, LLC. We request you provide the following information to us no later than October 19, 2021:

1. Please provided a comprehensive training and certification program. The information you provided is not adequate; it is not a comprehensive training and certification program similar to that provided by petitioners who have been issued similar grants of exemption (see Exemption No. 18009). The training and certification program should be a comprehensive course tailored for your proposed operations that includes theory and practical components, a pilot theory exam, and supervised operational familiarization training on agricultural spraying. Additionally, the training program requirements should include examination, flight test, and continued periodic training.
2. Please provide a comprehensive operational risk and safety manual containing a detailed risk analysis specific to your operation. The information you provided is not adequate; it is not an operational risk and safety manual similar to that provided by petitioners who have been issued similar grants of exemption (see Exemption No. 18009). The operational risk and safety manual should identify risks specific to your operation, provide procedures to mitigate those risks, and determine whether the residual risk level is acceptable.
3. Please provided a comprehensive flight operations and procedures manual. The information you provided is not adequate; it is not a comprehensive flight operations and procedures manual similar to that provided by petitioners who have been issued similar grants of exemption (see Exemption No. 18009) as part of their risk mitigation strategy. The flight operations and procedures manual should be tailored for your proposed operations, and it should include flying procedures, pre-and post-flight procedures, and maintenance information.
4. Please provide a multiple aircraft operations safety risk management (SRM) analysis that specifically identifies the increased hazard caused by one pilot in command operating up to five (5) Hyllo AG-122 UAS simultaneously. The information you provided is not adequate; it is not a SRM similar to that provided by petitioners who have been issued similar grants of exemption (see Exemption No. 17936). An acceptable SRM should analyze and identify the increased hazard caused by operating multiple aircraft, it should provide controls that mitigate the likelihood and severity of the increased hazard, and then determine whether the residual risk is acceptable. Your company's training and certification program, operational risk and safety manual, and flight operations and procedures manual should specifically address the procedures and methods that enable one pilot in command to operate up to five (5) Hyllo AG-122 UAS simultaneously and safely.
5. In your response to our first request, you listed additional weights for the Hyllo AG-122 UA, which did not resolve the discrepancy. Please specify the maximum weight for the UA you wish to operate (i.e., 143.3 pounds, 121 pounds, or 140 pounds).
6. In your response to our first request, you stated, "As to [#6], the pilot does hold a remote pilot airman certificate (also attached) resulting in this request being unnecessary and being withdrawn." Please confirm this was in reference to #8 in our original request, and that you wish to withdraw your petition for exemption from 49 U.S.C. § 44711(a)(2).

Please submit the additional information (non-proprietary) as a comment to your docket at www.regulations.gov, and save the tracking number generated after submission. Proprietary information may be submitted electronically to Nick DeLotell at nicholas.delotell@faa.gov and Sean O'Tormey at sean.p.o'tormey@faa.gov.

If you want us to process your request any further, we must receive the information described above by October 19, 2021. If we do not receive the information, we will close the docket without notifying you further. If you have any questions or require additional time, you may email us or call (202) 710-1163.

Respectfully,



Nick DeLotell

General Aviation & Commercial Division | Ops Group

Flight Standards Service

800 Independence Ave, SW | Washington, DC 20591

Text | Phone (202) 710-1163

For help with 49 U.S.C. § 44807 Special Authority for Certain Unmanned Systems (UAS Exemptions), see:
www.faa.gov/uas/advanced_operations/certification/section_44807.